



December 10, 2021

Mr. Andrew Chew  
Enforcement & Compliance Assurance Division (ECAD), Air Section (ENF-2-1)  
USEPA Region 9  
75 Hawthorne St.  
San Francisco, CA 94105

RE: Data Requested During November 17-18 Onsite inspection of Desert View  
Power LLC

Mr. Chew,

This letter and its attachments serve as follow up to the data requested during the onsite inspection to Desert View Power LLC ("DVP") on November 17 and 18 by the Environmental Protection Agency ("EPA"), South Coast Air Quality Management District ("SCAQMD"), and representatives of the Cabazon Band of Mission Indians.

While no formal data request was issued to DVP during the onsite inspection, the attached are intended to capture the items that were verbally requested as part of the inspection. One item of note during the onsite inspection was a discussion about the number of baghouse bags kept in inventory. While DVP has maintained compliance with its opacity limits, your suggestions for increasing the current stock were well-noted, and as such, additional bags have been ordered and should be received soon.

DVP appreciated the visit and opportunity to discuss our operations with EPA and SCAQMD, both of which have been to our site on a regular basis and to whom we also provide periodic reports. DVP also appreciated attendance by representatives of the Cabazon Band. Should you have any further questions or clarifications for the onsite inspection or attached information, please contact Kevin Lawrence at [klawrence@greenleaf-power.com](mailto:klawrence@greenleaf-power.com) or Mark Boucher at [mboucher@greenleaf-power.com](mailto:mboucher@greenleaf-power.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Martin".

Mitchell Martin  
Operations & Engineering Director  
Greenleaf Power

cc: Ken Dudash, SCAQMD, Air Quality Inspector  
Javier Aceves, Cabazon Tribe Environmental Manager  
Robert Hines, Farella Braun + Martel LLP  
Jonathan Dennis, Greenleaf Power

Enclosures sent to EPA File Share:

- 1) Opacity readings during inspection, 1 file
- 2) Baghouse Bag recent purchases from 2017, 1 combined file
- 3) Plant Process Diagram, 1 file
- 4) Desert View Power Site Plan, 1 file
- 5) Stack Test Calculation examples, 1 file
- 6) TDF Analysis of fuel used 9-23-2021
- 7) Hydrated Lime system WO, Example
- 8) Baghouse WO, Example
- 9) March 11, 2021, Hg Fuel Test Results
- 10) Boiler Water Chemistry
- 11) RMP
- 12) RMP Audit proposal, Audit taking place week of Dec 6, 2021
- 13) Wood fuel Ultimate Analysis's
- 14) Baghouse bag current inventory
- 15) Hydrated Lime system Monthly baghouse inspection
- 16) September production report showing TDF run

Desert View Power LLC ("DVP") submits this response subject to the following objections and reservations of rights:

- a) DVP objects to each request to the extent that it seeks documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, confidential business information, or any other applicable privilege. Should any such disclosure by DVP occur, it shall not constitute a waiver of any privilege. DVP further expressly reserves the right to make further representations as necessary to assert that the information herein is exempt from public disclosure under the Freedom of Information Act ("FOIA") and must not be disclosed.
- b) DVP incorporates by reference the general objection set forth above into each document submitted via EPA File Share.

CONFIDENTIAL FOIA TREATMENT REQUESTED – FOIA EXEMPT